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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

TRANSPERFECT GLOBAL, INC.,  
TRANSPERFECT TRANSLATIONS  
INTERNATIONAL, INC., AND  
TRANSLATIONS.COM, INC.,

Plaintiffs/Counter-Defendants,

v.

MOTIONPOINT CORPORATION,

Defendant/Counterclaimant.

Case No. CV 10-02590 CW (JCS)

**SECOND DECLARATION OF NIKOLAUS  
A. WOLOSZCZUK IN SUPPORT OF  
TRANSPERFECT'S AMENDED BILL OF  
COSTS**

Judge: Hon. Claudia Wilken

1 I, Nikolaus A. Woloszczuk declare that:

2 1. I am an associate at Latham & Watkins, and counsel for plaintiffs/counterclaim  
3 defendants TransPerfect Global, Inc., TransPerfect Translations International, Inc., and  
4 Translations.com, Inc. ("TransPerfect") in this action. Unless stated on information and belief, I  
5 make this declaration on my own personal knowledge, and if called as a witness, I could and  
6 would competently testify to the matters set forth herein.

7 2. This second declaration reflects an amendment to Exhibit C which was attached  
8 to the first declaration I submitted on November 29, 2013 (D.N. 474), and updates accordingly  
9 the total amount of costs TransPerfect requests be taxed in its Amended Bill of Costs. The  
10 attached Amended Exhibit C is intended to replace and supersede the previously submitted  
11 Exhibit C in its entirety.

12 3. Attached as Amended Exhibit C is an itemized list of the costs for the  
13 reproduction and exemplification of discovery documents and government records, visual aids at  
14 trial, and for trial exhibits provided to the Court. The costs submitted for Latham & Watkins'  
15 technical analyst are a true and accurate reflection of the hours billed to TransPerfect for time  
16 spent at trial to present exhibits and graphics using courtroom technology. Following the  
17 itemized list are true and correct copies of the invoices supporting these costs, a true and correct  
18 copy of a summary of the charges billed to TransPerfect for Latham & Watkins' technical  
19 analyst, and a true and correct copy of a summary of TransPerfect's in-house discovery work  
20 based on information provided by TransPerfect.

21 4. TransPerfect, through its attorneys, produced 202 gigabytes of documents and  
22 files to MotionPoint over the course of this litigation.

23 5. Plaintiff TransPerfect requests that the Court tax Defendant MotionPoint in the  
24 amount of \$431,820.82. TransPerfect believes that these costs are correctly stated, were  
25 necessarily incurred, and are allowable by law.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct.

3 Dated: December 6, 2013

LATHAM & WATKINS LLP

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5 By /s/ Nikolaus A. Woloszczuk  
6 Nikolaus A. Woloszczuk  
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